

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ADE GEORGE OYEBOLA, )  
Petitioner, ) C.A. NO. 04-10318-RGS  
v. )  
TOM RIDGE, Secretary, JOHN ASHCROFT, )  
Attorney General; EDUARDO AQUIRRE JR., )  
Director of USCIS; DENNIS RIORDAN, )  
District Director-Boston, USCIS, )  
Respondents. )

**RESPONDENTS' MOTION TO EXTEND TIME  
IN WHICH TO RESPOND TO PETITIONER'S COMPLAINT FOR MANDAMUS**

Now comes the above-captioned Respondents,<sup>1</sup> and hereby move this Court for an extension of time **up to and including June 11, 2004**, to answer or otherwise respond to Petitioner's Complaint. As reasons therefore, the undersigned counsel for Defendants asserts that such an extension will allow the Assistant U.S. Attorney the additional time to obtain relevant facts and background information of this matter from the relevant agency (Department of Homeland Security).

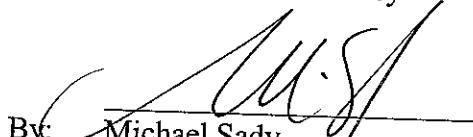
WHEREFORE, Respondents respectfully request that this Court allows their motion for

<sup>1</sup> This motion is not intended to be a responsive pleading. By the filing of this motion, Respondents are not waiving any of the procedural, affirmative, or other waivable and non-waivable defenses available to it in the normal course of filing a responsive pleading. Respondents intend to raise those defenses when it answers or otherwise responds to the Complaint.

an extension of time **up to and including June 11, 2004**, to answer or otherwise respond to the Petition.

Respectfully submitted,

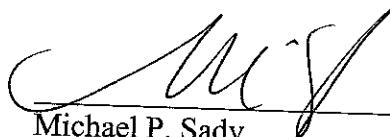
MICHAEL J. SULLIVAN  
United States Attorney

By:   
Michael Sady  
Assistant U.S. Attorney  
John Joseph Moakley U.S. Courthouse  
Suite 9200  
Boston, MA 02210  
(617) 748-3100

Dated: April 15, 2004

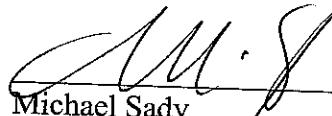
**CERTIFICATION UNDER L.R. 7.1**

Pursuant to Local Rule 7.1(a)(2), since plaintiff is pro se the parties have not conferred with regard to this motion.

  
Michael P. Sady  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I certify that on, I caused a copy of the foregoing Motion to be served on April 15, 2004 by first class mail, postage pre-paid to Petitioner, 46 Birchwood Road, U417, Randolph, MA 02368.

  
Michael Sady  
Assistant U.S. Attorney